## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

KIMBRA CRISWELL,	
Plaintiff, )	
v. )	C.A. No. 05-CV-00321 GMS
LYDIA ADAIR MCFADDEN and CHRISTIANA )	
CARE HEALTH SERVICES, INC.,	JURY TRIAL DEMANDED
Defendants.	

## **NOTICE OF RECORDS DEPOSITION**

PLEASE TAKE NOTICE that the undersigned attorney will take the records deposition of Aureus Radiology LLC on August 17, 2006 beginning at 10:00 a.m. in the offices of WHITE and WILLIAMS LLP, 824 North Market Street, Suite 902, Wilmington, Delaware 19801.

## **Duces Tecum:**

A <u>complete</u> copy of the entire employment file relating to Kimbra Criswell, including but not limited to application for employment, current job status, complete job description of all duties to be performed, yearly job performance/evaluation, attendance records, wage/salary information, employee benefit information, W-2 verification, any medical records, any claims or submission for Workers Compensation claims, any type of claims submitted for employee benefits, and complete description of all benefits.

Note: Personal appearance has been waived if the requested records and affidavit of substitute compliance are received in this office prior to the date of the scheduled deposition.

WHITE AND WILLIAMS LLP

By:

DEBORAH/MASSARO, ESQUIRE

824 Market Street, Suite 902

P.O. Box 709

Wilmington, DE 19899

(302) 654-0424

Attorney for Defendants, Lydia Adair McFadden

and Christiana Care Health Services, Inc.

Date: August 3, 2006

## **CERTIFICATE OF SERVICE**

I, Deborah Massaro, Esquire, certify that on this 3rd day of August, 2006, two copies of the foregoing **NOTICES OF RECORDS DEPOSITION** were delivered by regular U.S. mail, postage prepaid, to the following individuals:

Daniel W. Scialpi, Esquire Richard R. Wier, Jr., Esquire Law Offices of Richard R. Wier, Jr., P.A. 1220 Market Street, Suite 600 Wilmington, DE 19801 Nelson Levin, Esquire Michael T. Van Der Veen, Esquire Kats, Jamison, van der Veen & Associates 25 Bustleton Pike Feasterville, PA 17044

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